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15 JUL 1981

MEMORANDUM FOR: Chief, Regulations Control Division
Office of Information Services, DDA

25X1 FROM: [REDACTED]

Acting Director of Security

25X1 SUBJECT: Proposed [REDACTED] Ethical Conduct and
Responsibilities of Employees, Draft A [REDACTED]

25X1

REFERENCE: Memo from C/RCD, dated 11 June 1981,
same subject (Job #9570)

25X1 1. Please be advised that the Office of Security cannot
concur with the subject Proposal as written. Our specific con-
cern involves the provisions of paragraph r, Administrative
Enforcement Proceedings. There is no provision for access to
classified information on the part of attorneys, witnesses, and
former employees (who no longer hold a security clearance upon
termination). Neither is there provision for the control of
classified information. These matters can be addressed in the
manner utilized in proposed [REDACTED] Investigation of Discrimina-
tion Complaints; i.e., by addition of a paragraph devoted to
security concerns. However, this approach may not apply in the
case of Subject. It is not clear in the sections dealing with
hearings if an employee or former employee is expected to obtain
information through the Privacy Act or if the Agency is obliged
to provide information appropriate to his or her defense. With-
out clarification of this point, we cannot suggest language that
could serve to correct what we perceive to be an error of
25X1 omission. [REDACTED]

25X1 2. We anticipate that our position will be of interest to
the Office of General Counsel as well as the originator. We are,
of course, prepared to participate in meetings or assist in any
other way to expedite resolution. The Policy and Plans Group has
been designated as the action office on this matter. Please con-
25X1 tact [REDACTED]
25X1 if you have any questions or re-
quire additional information. [REDACTED]

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